

**KLESTADT WINTERS JURELLER
SOUTHARD & STEVENS, LLP**
200 West 41st Street, 17th Floor
New York, New York 10036
Tel: (212) 972-3000
Fax: (212) 972-2245
Fred Stevens
Christopher J. Reilly

Hearing Date: May 13, 2021 @
10:00 a.m. (EST)
Objection Deadline: May 7, 2021
@ 5:00 p.m. (EST)

*Special Litigation Counsel to Plaintiff Gregory Messer,
Chapter 7 Trustee of the Estate of Fyre Festival LLC*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----x
In re :
FYRE FESTIVAL LLC, : Chapter 7
Debtor. : Case No. 17-11883 (MG)
-----x

**NOTICE OF HEARING ON TRUSTEE'S MOTION FOR AN ORDER PURSUANT TO
FED. R. BANKR. P. 9019 APPROVING A STIPULATION OF SETTLEMENT
BETWEEN THE TRUSTEE AND TICKETHOLDER CLAIMANTS**

TO COUNSEL TO THE DEBTOR, THE UNITED STATES TRUSTEE AND ALL PARTIES
ENTITLED TO NOTICE PURSUANT TO FED. R. BANKR. P. 2002:

PLEASE TAKE NOTICE that upon the motion (the “Motion”), of Gregory M. Messer, Chapter 7 Trustee of the estate of Fyre Festival LLC (the “Trustee”), the above-captioned debtor (the “Debtor”), for an Order Pursuant to Fed. R. Bankr. P. 9019 Approving a Stipulation of Settlement Between the Trustee and each of the claimant ticketholders (each a “Ticketholder Claimant,” collectively, the “Ticketholder Claimants”), who filed Proofs of Claim Nos. 4 to 281 (each a “Ticketholder Claim,” collectively, the “Ticketholder Claims”), a telephonic hearing (the “Hearing”) will be held on the **13th day of May, 2021, at 10:00 a.m. (EST)**, or as soon thereafter as counsel may be heard (the “Hearing”), before the Honorable Martin Glenn, United States Bankruptcy Judge, in his courtroom (#523) at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, to consider the relief sought in the Motion. The telephonic Hearing will be conducted using Court Solutions LLC. All attorneys and parties wishing to appear at, or attend, the telephonic hearing must make arrangements with Court Solutions at <https://www.court-solutions.com/> no later than 12 p.m. on the business day prior to the Hearing.

PLEASE TAKE FURTHER NOTICE that the Stipulation contains the following salient provisions:¹

- Fixing and Allowing the Ticketholder Claims. The Ticketholder Claims shall be consolidated, fixed and allowed as a single, timely-filed general unsecured claim against the Debtor's bankruptcy estate in the total amount of Two-Million Dollars (\$2,000,000.00).
- Method of Distribution. When and if the Trustee makes any distribution on account of the Allowed Consolidated Ticketholder Claim, it will be by single payment made to "Geragos & Geragos, APC, as attorneys."
- Geragos Firm Responsibility. The Geragos Firm shall take any and all responsibility for the allocation of any Ticketholder Distribution amongst the Ticketholder Claimants and/or itself as counsel to the Ticketholder Claimants as may be permitted pursuant to any agreements between the Ticketholder Claimants and the Geragos Firm. The Trustee shall have no right or responsibility to make any distribution to individual Ticketholder Claimants, or to monitor or review what the Geragos Firm does following the Trustee's making any Ticketholder Distribution.

PLEASE TAKE FURTHER NOTICE that the Motion has been filed electronically with the Clerk of the United States Bankruptcy Court for the Southern District of New York, and may be reviewed by all registered users of the Court's website at <http://ecf.nysb.uscourts.gov/>. Copies of the Motion can also be obtained by telephonic, written, or e-mail request to the undersigned counsel to the Trustee, Attn: Kristen Strine, Paralegal (Telephone: (212) 972-3000 or e-mail: kstrine@klestadt.com).

PLEASE TAKE FURTHER NOTICE that responses, if any, to the relief sought in the Motion shall be made in writing, filed with the Court by registered users of the Court's electronic case filing system and, by all other parties in interest, mailed to the Clerk of the United States Bankruptcy Court, Southern District of New York, One Bowling Green, New York, New York 10004, on a 3.5 inch floppy disc or compact disc, preferably in portable document Format (PDF), Microsoft Word, or any other Windows Based word processing format (with a hard copy delivered directly to the Chambers of the Honorable Martin Glenn, United States Bankruptcy Judge, United States Bankruptcy Court, Southern District of New York, One Bowling Green, New York, New York 10004), and served upon Klestadt Winters Jureller Southard & Stevens, LLP, 200 West 41st Street, 17th Floor, New York, NY 10036-7203, Attn: Fred Stevens, Email: fstevens@klestadt.com, so as to be actually received no later than **5:00 p.m. (EST) on May 7, 2021 at 5:00 p.m. (EST)**.

¹ The Stipulation should be read in its entirety. This summary is not intended to capture every salient term of the Stipulation.

Dated: New York, New York
April 13, 2021

**KLESTADT WINTERS JURELLER
SOUTHARD & STEVENS**

By: /s/ Christopher Reilly

Fred Stevens
Christopher Reilly
200 West 41st Street, 17th Floor
New York, New York 10036-7203
Tel: (212) 972-3000
Fax: (212) 972-2245
Email: fstevens@klestadt.com
creilly@klestadt.com

*Special Litigation Counsel to Gregory M.
Messer, Chapter 7 Trustee*